

Message

**From:** Parker, Cindy [parker.cindy@epa.gov]  
**Sent:** 5/16/2017 12:47:08 PM  
**To:** Verhalen, Frances [verhalen.frances@epa.gov]; Madden, Joshua [madden.joshua@epa.gov]  
**Subject:** FW: emissions and release point changes - follow up

Fyi.

**From:** NATA  
**Sent:** Tuesday, May 16, 2017 7:31 AM  
**To:** 'Danielle Nesvacil' <danielle.nesvacil@tceq.texas.gov>; NATA <NATA@epa.gov>  
**Cc:** Parker, Cindy <parker.cindy@epa.gov>; Kevin Cauble <kevin.cauble@tceq.texas.gov>  
**Subject:** RE: emissions and release point changes - follow up

Danielle,  
 Thanks for sending this. I am very close to implementing these changes -- I just have a few questions -- sorry about not asking these earlier.

1. For

Texas	48439	Tarrant	17086911	MOSIER VALLEY COMPRESSOR STATOLN
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In particular,

agy_facility_id	unit_id	process_id	agy_unit_id	agy_process_id
1747	113029013	159869014	000005	000005

The VOC changed from 5.0703 tons to 0.0004 tons but the HAP VOC for many HAPs far exceeds that. For example: methanol is 0.0027 tons, acetaldehyde is 0.0091 tons, xylenes is 0.00889 tons hexane is 0.0012 tons, acrolein is 0.0056 tons and naphthalene is 0.003595 tons. It also doesn't make sense to have 0 benzene and 0 toluene yet nonzero values of the more trace HAPs that are emitted from that SCC such as tetrachloroethylene, vinyl chloride, biphenyl, ethyl benzene, 1,3 butadiene, etc.

Same issue for the below unit/process -- where VOC is changed to 0.0603 but HAP VOC far exceed that (formaldehyde is 0.5159) .

agy_facility_id	unit_id	process_id	agy_unit_id	agy_process_id
1747	113028913	159868914	000004	000004

2. For the hexavalent chromium change--

State or Tribe	FIPS	county	facility_id	facility name
Texas	48113	Dallas	4899011	MARSHALL STREET FACILITY

You have a change to hexavalent chromium should I also adjust trivalent? Was total chromium tested and I apply the same speciation factor or was hexavalent tested and you have no value for trivalent?

Same question for

State or Tribe	FIPS	county	facility_id	facility name
Texas	48309	McLennan	6892011	Precise Hard Chrome

Thanks much!

Madeleine Strum|U.S. Environmental Protection Agency|109 TW Alexander Drive, RTP, NC 27711  
Office of Air Quality Planning and Standards|Air Quality Assessment Division|Emission Inventory and Analysis Group|919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

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**From:** Danielle Nesvacil [<mailto:danielle.nesvacil@tceq.texas.gov>]  
**Sent:** Monday, May 15, 2017 6:22 PM  
**To:** NATA <[NATA@epa.gov](mailto:NATA@epa.gov)>  
**Cc:** Parker, Cindy <[parker.cindy@epa.gov](mailto:parker.cindy@epa.gov)>; Kevin Cauble <[kevin.cauble@tceq.texas.gov](mailto:kevin.cauble@tceq.texas.gov)>  
**Subject:** Re: emissions and release point changes - follow up

Madeleine,

I apologize for the delay. Please see the attached and let me know if you have any questions/comments/concerns.

I highlighted the updates/new comments in an orange color so you could tell them from the original change sheet.

I really appreciate your help on this.

Regards,  
Danielle

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**From:** NATA <[NATA@epa.gov](mailto:NATA@epa.gov)>  
**Sent:** Monday, May 15, 2017 6:44 AM  
**To:** Danielle Nesvacil  
**Cc:** Parker, Cindy  
**Subject:** FW: emissions and release point changes - follow up

Hi Danielle,  
Can you send me the updated sheet with the few items we discussed last Monday?

Thanks

Madeleine Strum|U.S. Environmental Protection Agency|109 TW Alexander Drive, RTP, NC 27711  
Office of Air Quality Planning and Standards|Air Quality Assessment Division|Emission Inventory and Analysis Group|919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

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**From:** NATA

**Sent:** Saturday, May 06, 2017 10:45 PM

**To:** Danielle Nesvacil <danielle.nesvacil@tceq.texas.gov>; NATA <NATA@epa.gov>

**Cc:** Parker, Cindy <parker.cindy@epa.gov>

**Subject:** emissions and release point changes - follow up

Hi Danielle

Sorry for not getting back to you as fast on this one – I was sick a few days last week and now pretty overloaded between the EIS submissions and change sheets to process.

I appreciate your efforts in consolidating the change sheets and also for taking the time to put in the detailed helpful explanations and look into the TRI data. I do have follow up comments/questions that I've attached in the blue highlighted cells. Can we discuss these and your other questions at 11:30 central time (12:30 Eastern) on Monday? Also is part2 of 2 (i.e., the attached) the only change sheet I need to process? Also on the release point change sheet are there just the 2 release points from the below facility that need to be changed and can we work through what that change should be?

State or Tribe	region_cd	county	facility_id	facility name
Texas	48201	Harris	4167011	CB&I HOUSTON PLANT
Texas	48201	Harris	4167011	CB&I HOUSTON PLANT

Thanks and looking forward to hearing from you Monday.

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711

Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

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**From:** Danielle Nesvacil [mailto:danielle.nesvacil@tceq.texas.gov]

**Sent:** Tuesday, May 02, 2017 6:24 PM

**To:** NATA <NATA@epa.gov>

**Subject:** RE: Texas Priority Facility Check List

Thank you so much for the quick reply.

I accidentally omitted the EtO updates in the Texas Process Change spreadsheet. I have attached a new version of this spreadsheet with the changes. We communicated these changes to Region 6 (Cindy Parker) well in advance of the deadline, but neglected to include them in the email yesterday. I sincerely apologize.

Could we talk sometime about one Texas site, Mosier Valley compressor station? The site submitted updated emissions, but the TCEQ database does **\*not\*** have the EIS ID entered for the generators (emissions units), and I'm having a hard time completing all of the updates for this facility. I'm not sure the best way to proceed.

Thanks so much for your patience,  
Danielle

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**From:** NATA [<mailto:NATA@epa.gov>]  
**Sent:** Monday, May 01, 2017 7:09 PM  
**To:** Danielle Nesvacil; NATA  
**Subject:** RE: Texas Priority Facility Check List

Hi Danielle,

The risks are different because they are reflecting the 2 different modeling results – Sept 2016 vs January 2017. If the facility was in the Change sheet in Sept 2016 because it was over 10 in a million, we didn't make any changes to the change sheet, even if the risks went up in the January 2017 modeling to over 100 in million. We did make sure any facility, that based on the January 2017 modeling was greater than 100 in a million would be in the check list.

If you go to the View 1 comparison on SharePoint

[https://usepa.sharepoint.com/sites/oar\\_Work/NATAREVIEW/2014Facility/Data/January%202017%20Updates/NATA%202014%20Point%20max%20risk%20and%20hi%20Comparison%20File%20Summary.xlsx?d=wd698831460d94a5299d9658139068f39](https://usepa.sharepoint.com/sites/oar_Work/NATAREVIEW/2014Facility/Data/January%202017%20Updates/NATA%202014%20Point%20max%20risk%20and%20hi%20Comparison%20File%20Summary.xlsx?d=wd698831460d94a5299d9658139068f39) you will see the comparison between the Sept2016 and January 2017 results -- the change in risks were due to a change in MET data and/or the ethylene oxide unit risk estimate updated.

The reason we didn't update the process change sheet to put in the January risk information was that some states had already sent in their data based on the September 2016 review so we did not want to put in the same facility twice. In addition there were no emissions changes between Sept2016 and January2017.

If the facility was not over 10 in a million in September (so it wasn't in the change sheets in September) but changed to over 10 in a million in January then it got added to the change sheets in the

[https://usepa.sharepoint.com/sites/oar\\_Work/NATAREVIEW/2014Facility/Data/January%202017%20Updates/NATA%202014%20Point%20max%20risk%20and%20hi%20Comparison%20File%20Summary.xlsx?d=wd698831460d94a5299d9658139068f39](https://usepa.sharepoint.com/sites/oar_Work/NATAREVIEW/2014Facility/Data/January%202017%20Updates/NATA%202014%20Point%20max%20risk%20and%20hi%20Comparison%20File%20Summary.xlsx?d=wd698831460d94a5299d9658139068f39) folder on SharePoint.

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Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

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**From:** Danielle Nesvacil [<mailto:danielle.nesvacil@tceq.texas.gov>]  
**Sent:** Monday, May 01, 2017 6:43 PM  
**To:** NATA <[NATA@epa.gov](mailto:NATA@epa.gov)>  
**Subject:** Texas Priority Facility Check List

Hi--

For many of the sites, the facility total max cancer risk in the Texas Priority Facility Check List does **\*not\*** match the facility total risk in the Texas Process Change spreadsheet.

For example, the Priority Checklist lists a facility total max cancer risk of 1316.24 for "TEXAS OPERATIONS" in Harrison County, whereas the Texas48\_Chg\_Process spreadsheet lists the max cancer risk as 37.4.

Which version of the spreadsheet has the correct max cancer risk ?

Thanks,  
Danielle